

1 Michael Kind, Esq.  
2 Nevada Bar No.: 13903  
3 **KIND LAW**  
4 8860 South Maryland Parkway, Suite 106  
5 Las Vegas, Nevada 89123  
6 (702) 337-2322  
7 (702) 329-5881 (fax)  
8 mk@kindlaw.com  
9 *Attorney for Plaintiff Wesley Szarejko*

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 Wesley Szarejko,

11 Plaintiff,

12 v.

13 MRS Associates, Inc et al,

14 Defendant.

Case No.: 2:20-cv-00239-GMN-VCF

**Stipulation to extend the deadline to  
file the proposed discovery plan and  
scheduling order**

**(First request)**

16 Wesley Szarejko (“Plaintiff”) and MRS Associates, Inc (“Defendant” and  
17 together with Plaintiff as the “parties”), by and through their respective counsel,  
18 hereby stipulate to extend the deadline for the parties to file their stipulated or  
19 proposed discovery plan and scheduling order. The deadline to file the proposed plan  
20 is currently set for April 10, 2020.

21 Good cause exists to continue the deadline. Defendant recently filed its  
22 motion to dismiss and intends to request that discovery be stayed pending the motion  
23 to dismiss. In the meantime, the parties are actively exploring possible early  
24 resolution that may avoid the need for additional briefing by both sides.

25 The parties therefore agree that it is appropriate to extend the deadline for the  
26 parties to file a proposed or stipulated discovery plan and scheduling order to allow  
27

1 time for the parties to continue to explore early resolution. This request for an  
2 extension is made specifically in this fee-shifting matter since briefing motions are  
3 a significant expense and settlement discussions are ongoing. The parties therefore  
4 seek to extend the deadline to file the proposed plan by 14 days, on or before **April**  
5 **24, 2020**. This is the first request for an extension of these deadlines.

6 Dated: April 9, 2020.

7 **KIND LAW**

8  
9 /s/ Michael Kind  
10 Michael Kind, Esq.  
11 8860 South Maryland Parkway, Suite 106  
12 Las Vegas, Nevada 89123  
13 *Attorney for Wesley Szarejko*

14 **MOSS & BARNETT**

15 /s/ Bradley Armstrong  
16 Bradley Armstrong, Esq.  
17 150 South Fifth Street, Suite 1200  
18 Minneapolis, MN 55402

19 Raleigh C. Thompson, Esq.  
20 Ryan Lower, Esq.  
21 MORRIS LAW GROUP  
22 411 E. Bonneville Ave., Ste. 360  
23 Las Vegas, Nevada 89101  
24 *Attorney for MRS Associates, Inc*

25 IT IS SO ORDERED:

26   
27 UNITED STATES MAGISTRATE JUDGE

DATED: 4-10-2020